



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604

EPA Region 5 Records Ctr.



314006

REPLY TO THE ATTENTION OF: SR-6J

VIA ELECTRONIC MAIL AND USPS

Tuesday, September 11, 2007

Jennifer Hale  
Environment Health & Safety, WTC 2G2  
P.O. Box 9777  
Federal Way, WA 98063-9777

RE: Plainwell Mill, Operable Unit #7, Allied Paper/Portage Creek/Kalamazoo River Site  
Comments: *Plainwell Mill Banks Emergency Action Conceptual Design Approach*

Dear Ms. Hale:

On August 15, 2007, RMT, Inc. provided a copy of the *Plainwell Mill Banks Emergency Action Conceptual Design Approach* (CDA) on behalf of Weyerhaeuser to Region 5. Region 5 is providing comments and recommendations regarding the draft CDA.

General Comments

- A. When referring to a document by its whole title, please italicize the title.
- B. The terms 'bank' and 'shoreline' are being used interchangeably within the document. Region 5 suggests that a single term, 'bank,' be used.

Specific Comments

1. Page 1 - ¶ 2 - RMT states that "In a letter dated June 29, 2007, the United States Environmental Protection Agency (USEPA) has acknowledged that the actions being taken for the Plainwell TCRA could cause a release of hazardous substances from the Plainwell Mill Property." This sentence mischaracterizes U.S. EPA's letter of June 29, 2007. In that letter, U.S. EPA stated its understanding that Weyerhaeuser had determined that certain work to be performed in connection with the time-critical removal action at the Plainwell Impoundment threatened the release of waste material from the banks of the Plainwell Mill. U.S. EPA authorized Weyerhaeuser to take response actions consistent with the company's determination. Please either rephrase your statement to accurately characterize the 6/29/07 letter, or delete this sentence from the paragraph.

2. Page 1 - ¶ 2 – It is unclear what is meant by “containing paper residuals.” Please provide additional details. Please remove the word “generally” from the last sentence of this paragraph.
3. Page 1 - ¶ 3 – Please specify the number of hand augers placed during the July 2007 investigation.
4. Page 2 – Bullet 3 (top of the page) – “Multiple” and “flexible” are redundant in this sentence. Please remove “multiple.”
5. Page 2 – Bullet 1 (middle of the page) – Emergency actions taken should also be addressing known PCB hits above 50 PPM. Please rephrase the sentence to reflect this requirement.
6. Page 2 – Bullet 2 (middle of the page) – This bullet is poorly phrased; this bullet implies there will be a continued release of PCBs from the site, even after the emergency action.
7. Page 2 – Bullet 3 (middle of the page) – Reconstruction and reconfiguration of the banks should be as consistent with City of Plainwell re-development plans to the extent practicable. Please consult with the City of Plainwell.
8. Page 3 – Step 5 – It is unclear if the “post-excavation survey” will be taken prior to any reconstruction of the banks or after. This should be clarified.
9. Page 4 – Table – The label for column “Approximate volume to be removed (Cubic Yards)” is ambiguous. Do the numbers represent cubic yards to be removed from the banks (shoreline), floodplain, sediments, or cumulatively? This should be revised.
10. Page 7 – Section 2.2 - ¶ 1 – The method employed for handling of and disposal of root wads should take into consideration the potential for PCB residuals to be adhered to the root wads.
11. Page 8 – Section 2.5 - ¶ 2 – In which part of the river (near banks, middle, opposite bank) will turbidity monitoring take place? In addition, if safety permits, downstream measurements should be taken closer to the active excavation area. It should also be noted that additional anchoring will be needed for the silt curtain, based on the effort currently required to maintain the silt curtains at the Plainwell Impoundment Time Critical Removal.
12. Page 9 – Section 2.8 - ¶ 1 – Please define ‘moderate stresses’ and the expected slope of the reconfigured/reconstructed banks.
13. Attachment 1 – Region 5 does not believe the inclusion of this attachment supports the CDA in any substantial manner. Please remove the attachment.

Thank you for your attention to this matter. Please do not hesitate to call me at 312.886.1434, should you have any questions related to the task.

Sincerely,

A handwritten signature in black ink, appearing to be 'SC' with a stylized flourish at the end.

Sam Chummar, Remedial Project Manager  
U.S. EPA Region 5  
Superfund Division – Remedial Response Branch #1  
77 W Jackson Blvd. (SR-6J)  
Chicago, IL 60604

cc: Eileen Furey, C-14J  
James Saric, SR-6J  
Michael Berkoff, SR-6J  
Paul Bucholtz, MDEQ